

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA,  
NORTHERN DIVISION**

<b>TERA McMILLAN</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 2:07-cv-00001-WKW</b>
	)	
<b>ALABAMA DEPARTMENT OF</b>	)	
<b>YOUTH SERVICES, et al</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT ALABAMA DEPARTMENT OF YOUTH SERVICES EXHIBIT LIST**

COMES NOW the Defendant, Alabama Department of Youth Services, by and through undersigned counsels, and submits this list of proposed exhibits in this matter in accordance with the Court's Order dated February 14, 2008.

The following are the proposed Exhibits to be used during trial:

- 1.Tera A. McMillan's personnel file.
- 2.Michael Hardy's personnel file.
- 3.Tera McMillian's deposition.
- 4.Alabama Department of Youth Services policy number 4.2.
- 5.T.Dudley Perry, Jr's, August 11, 2006 Employee's Brief of Evidence to Administrative Law Judge Julia Weller.
- 6.Administrative Law Judge Julia Weller's August 1, 2007 Recommended Order to the State Personnel Board on the Michael Hardy State Personnel Case.
- 7.October 17, 2008 Order of the Personnel Board of the State of Alabama in the matter of Michael Hardy.
- 8.Plaintiff's EEOC Charges of Discrimination.
- 9.Special Investigator Alan Staton's investigation of Plaintiff's allegations of

alleged discrimination based on sex and retaliation (EEOC 130-2006-01336). Enclosed in the investigation besides Ms. McMillian's Personnel Documentation are statements by Hammond; Hood; Webster; Harris; Rankins; and Lee. Also in closed are copies of work schedules, leave request relating to Ms. McMillian.

10. January 6, 2006 letter from J. Walter Wood, Jr. To Michael Hardy indicating that based on the evidenced from the November 10, 2005 fact finding hearing that he was dismissed from the Department effective at the close of business January 6, 2006.
11. Quality Assurance Mandatory Training/Sign-in list.
12. Affidavits given by Plaintiff McMillian in this matter.
13. Statements made by Plaintiff McMillian in this matter.
14. Transcripts of Hardy's administrative procedure discharge hearings.
15. Exhibits introduced at Hardy's administrative procedure discharge hearings.
16. Any and all exhibits on the Plaintiff's and Defendant Hardy's exhibit list.

Respectfully submitted this 19<sup>th</sup> day of June 2008,

**s/ T. Dudley Perry Jr.**

T. Dudley Perry, Jr.

Bar Number: 3985-R67T

General Counsel

Attorney for the Defendant

Alabama Department of Youth Services

Post Office Box 66

Mt. Meigs, AL 36057

Telephone: (334) 215-3803

Fax: (334) 215-3872

E-Mail: [dudley.perry@dys.alabama.gov](mailto:dudley.perry@dys.alabama.gov)

**s/Sancha E. Teele**

Sancha E. Teele

Assistant Attorney General

Bar Number: 0103-H71T

Attorney for the Defendant

Alabama Department of Youth Services  
Post Office Box 66  
Mt. Meigs, AL 36057  
Telephone: 334-215-3803  
Fax: (334) 215-3872  
E-Mail: [sancha.teele@dys.alabama.gov](mailto:sancha.teele@dys.alabama.gov)

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 19<sup>th</sup> day of June, 2008, I electronically filed the foregoing,  
**DEFENDANT ALABAMA DEPARTMENT OF YOUTH SERVICES EXHIBIT LIST** with  
the Clerk of the Court using the CM/ECF system which will send notification of such filing to  
the following:

Jimmy Jacobs  
E-mail:jacobslawoffice@charter.net  
Attorney At Law  
143 Eastern Boulevard  
Montgomery, AL 36117  
Tel: (334) 215-1788  
Fax: (334) 215-1198

James Eldon Wilson  
E-mail:jameseldonwilson@mindspring.com  
Attorney At Law  
4265 Lomac Street  
Montgomery, AL 36106  
Tel: (334) 409-2003  
Fax: (334) 409-2009

**s/ T. Dudley Perry Jr.**  
T. Dudley Perry, Jr.  
Bar Number: 3985-R67T  
Deputy Attorney General  
Attorney for the Defendants